

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

|                                      |   |                                |
|--------------------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA,            | ) | CASE NO.                       |
|                                      | ) |                                |
| Plaintiff,                           | ) | JUDGE                          |
|                                      | ) |                                |
| v.                                   | ) |                                |
|                                      | ) |                                |
| \$350,050.00 IN U.S. CURRENCY SEIZED | ) |                                |
| ON OCTOBER 30, 2019,                 | ) |                                |
|                                      | ) |                                |
| \$6,000.00 IN U.S. CURRENCY SEIZED   | ) |                                |
| ON OCTOBER 30, 2019,                 | ) |                                |
|                                      | ) |                                |
| 18K YELLOW GOLD ROLEX DAY-DATE       | ) |                                |
| WATCH SEIZED ON OCTOBER 30, 2019,    | ) |                                |
|                                      | ) |                                |
| ASSORTED JEWELRY WITH AN             | ) |                                |
| APPROXIMATE VALUE OF \$67,361.00     | ) |                                |
| SEIZED ON OCTOBER 30, 2019,          | ) |                                |
|                                      | ) |                                |
| Defendants.                          | ) |                                |
|                                      | ) | <b>COMPLAINT IN FORFEITURE</b> |

NOW COMES plaintiff, the United States of America, by Justin E. Herdman, United States Attorney for the Northern District of Ohio, and Henry F. DeBaggis, Assistant U.S. Attorney, and files this Complaint in Forfeiture, respectfully alleging, in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure, as follows:

**JURISDICTION AND INTRODUCTION**

1. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. Section 1345, and over an action for forfeiture under 28 U.S.C.

Section 1355(a). This Court also has jurisdiction over this particular action under 21 U.S.C. Section 881(a)(6).

2. This Court has *in rem* jurisdiction over the defendants currency and property: (i) pursuant to 28 U.S.C. Section 1355(b)(1)(A) because acts giving rise to the forfeiture occurred in this district; and, (ii) pursuant to 28 U.S.C. Section 1355(b)(1)(B), incorporating 28 U.S.C. Section 1395, because the action accrued in this district. This Court will have control over the defendants currency and property through service of an arrest warrant *in rem*, which the Drug Enforcement Administration (DEA) will execute upon the defendant currency and property. *See*, Supplemental Rules G(3)(b) and G(3)(c).

3. Venue is proper in this district: (i) pursuant to 28 U.S.C. Section 1355(b)(1)(A) because acts giving rise to the forfeiture occurred in this district; and, (ii) pursuant to 28 U.S.C. Section 1395 because the action accrued in this district.

4. On October 30, 2019, the defendants \$350,050.00 and \$6,000.00 in U.S. Currency and a 18K Yellow Gold Rolex Day-Date Watch and Assorted Jewelry with an Approximate Value of \$67,361.00 were seized from Cory L. Grandison's residence at XXXX Brittany Boulevard, Akron, Ohio. The seizure was made by DEA special agents and local law enforcement officers pursuant to a federal search warrant authorized by Magistrate Judge Kathleen B. Burke on October 28, 2019. The defendants currency and property are now in the custody of the federal government.

5. Subsequent to the seizure, the DEA commenced an administrative forfeiture proceeding against the defendants currency and property. A claim to the defendants currency and property was submitted by Cory L. Grandison in the administrative forfeiture proceeding, thereby requiring the filing of this judicial forfeiture action.

6. The defendants currency and property are subject to forfeiture to the United States under 21 U.S.C. Section 881(a)(6) in that they constitute proceeds from illegal drug trafficking activities, and/or were used - or were intended to be used - in exchange for illegal controlled substances, and/or were used - or were intended to be used - to facilitate illegal drug trafficking activities.

### **FORFEITURE**

7. On October 30, 2019, at approximately 10:00 a.m., DEA special agents and local law enforcement officers executed a search warrant at the residence of Corey L. Grandison located at XXXX Brittany Boulevard, Akron, Ohio. At the time of the search, Grandison was present at the residence.

8. During the search of the residence, law enforcement seized the following property:

- a. Smith & Wesson Body Guard .380 pistol loaded with seven (7) rounds of Hornady ammunition;
- b. Two (2) Royal Sovereign money counters;
- c. \$350,050.00 in U.S. Currency in a backpack;
- d. \$6,000.00 in U.S. Currency;
- e. 18K yellow gold Rolex Day-Date watch;
- f. Assorted jewelry with an approximate value of \$67,361.00;
- g. One (1) bag of suspected marijuana;
- h. One (1) vial of suspected steroids; and
- i. Miscellaneous marijuana edibles.

9. Prior to the seizures, Grandison was asked if there were any money or guns inside his residence and he stated that there was a backpack upstairs that contained one hundred

thousand dollars (\$100,000.00). After the currency was seized from the backpack, Grandison stated that he was not employed but stated he flipped vehicles as a source of income<sup>1</sup>.

10. Prior to the seizures, the DEA made the following controlled purchases of crystal methamphetamine from Cory L. Grandison:

a. In October 2018, a controlled purchase of 443.92 grams of crystal methamphetamine was made from Grandison at a residence in Akron, Ohio;

b. In January 2019, a controlled purchase of 440.32 grams of crystal methamphetamine was made from Grandison at a business in Akron, Ohio; and

c. In March 2019, a controlled purchase of 445.39 grams of crystal methamphetamine was made from Grandison at a residence in Akron, Ohio.

11. Prior to the seizures, Cory L. Grandison was convicted of Trafficking in Cocaine on or about February 3, 2006, in case number CR-2005-11-4027, in the Summit County Court of Common Pleas and he was sentenced to one (1) year in prison.

12. Prior to the seizures, Cory L. Grandison was convicted of Aggravated Possession of Drugs on or about January 14, 2010, in case number CR-2009-11-3334, in the Summit County Court of Common Pleas, and he was sentenced to two (2) years of community control.

13. After the seizures, on February 18, 2020, Grandison pleaded guilty plea to being a felon in possession of a firearm in the United States District Court for the Northern District of Ohio; Case No. 5:19 CR 714, and he agreed to the forfeiture of the Smith & Wesson Body Guard .380 pistol and seven (7) rounds of ammunition seized at his residence on October 30, 2019.

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<sup>1</sup> Records from the Ohio Department of Taxation show that Cory L. Grandison's federal adjusted gross income for the following tax years were reported as: 2013--\$11,717; 2014--\$865; 2015--\$10,106; 2016—nothing on file; and 2017--\$14,087.



### CONCLUSION

14. By reason of the foregoing, the defendants \$350,050.00 and \$6,000.00 in U.S. Currency and the 18K Yellow Gold Rolex Day-Date Watch and Assorted Jewelry with an Approximate Value of \$67,361.00 are subject to forfeiture to the United States under 21 U.S.C. § 881(a)(6) in that they constitute proceeds from illegal drug trafficking activities, and/or were used - or were intended to be used - in exchange for illegal controlled substances, and/or were used - or were intended to be used - to facilitate illegal drug trafficking activities.

WHEREFORE, plaintiff, the United States of America, requests that this Court enter judgment condemning the defendants currency and property and forfeiting them to the United States, and providing that the defendant currency and property be delivered into the custody of the United States for disposition according to law, and for such other relief as this Court may deem proper.

Respectfully submitted,

Justin E. Herdman  
United States Attorney  
Northern District of Ohio

By:



Henry F. DeBaggis (OH: 0007561)  
Assistant United States Attorney  
Carl B. Stokes U.S. Court House  
801 West Superior Avenue, Suite 400  
Cleveland, Ohio 44113  
216.622.3749 / Fax: 216.522.7499  
Henry.DeBaggis@usdoj.gov

VERIFICATION

STATE OF OHIO                    )  
  ) SS.  
COUNTY OF CUYAHOGA    )

I, Henry F. DeBaggis, under penalty of perjury, depose and say that I am an Assistant United States Attorney for the Northern District of Ohio, and the attorney for the plaintiff in the within entitled action. The foregoing Complaint in Forfeiture is based upon information officially provided to me and, to my knowledge and belief, is true and correct.



Henry F. DeBaggis (OH: 0007561)  
Assistant United States Attorney

Sworn to and subscribed in my presence this 25 day of February, 2020.



DIANE SCHNEIDER  
NOTARY PUBLIC  
STATE OF OHIO  
COMM. EXPIRES

RECORDED IN  
CUYAHOGA COUNTY



Notary Public

JS 44 (Rev. 02/19)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

United States of America

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
Henry F. DeBaggis, Assistant U.S. Attorney  
801 West Superior Avenue, Suite 400, Cleveland, Ohio 44113  
216-622-3749

**DEFENDANTS**

\$350,050.00 U.S. Currency, \$6,000.00 U.S. Currency, 18K Yellow Gold Rolex Day-Date, Assorted Jewelry Valued at \$67,361.00.

County of Residence of First Listed Defendant Summit County  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)  
Mr. Thomas Bauer, Jr.  
Burdon & Merlitti  
137 South Main Stree, #201, Akron, OH 44308

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in one Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

| CONTRACT  | TORTS  | FORFEITURE/PENALTY   | BANKRUPTCY   | OTHER STATUTES  |   |
|---|--|--|--|---|---|
| <input type="checkbox"/> 110 Insurance<br><input type="checkbox"/> 120 Marine<br><input type="checkbox"/> 130 Miller Act<br><input type="checkbox"/> 140 Negotiable Instrument<br><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment<br><input type="checkbox"/> 151 Medicare Act<br><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)<br><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits<br><input type="checkbox"/> 160 Stockholders' Suits<br><input type="checkbox"/> 190 Other Contract<br><input type="checkbox"/> 195 Contract Product Liability<br><input type="checkbox"/> 196 Franchise | <b>PERSONAL INJURY</b><br><input type="checkbox"/> 310 Airplane<br><input type="checkbox"/> 315 Airplane Product Liability<br><input type="checkbox"/> 320 Assault, Libel & Slander<br><input type="checkbox"/> 330 Federal Employers' Liability<br><input type="checkbox"/> 340 Marine<br><input type="checkbox"/> 345 Marine Product Liability<br><input type="checkbox"/> 350 Motor Vehicle<br><input type="checkbox"/> 355 Motor Vehicle Product Liability<br><input type="checkbox"/> 360 Other Personal Injury<br><input type="checkbox"/> 362 Personal Injury - Medical Malpractice | <b>PERSONAL INJURY</b><br><input type="checkbox"/> 365 Personal Injury - Product Liability<br><input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability<br><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability<br><b>PERSONAL PROPERTY</b><br><input type="checkbox"/> 370 Other Fraud<br><input type="checkbox"/> 371 Truth in Lending<br><input type="checkbox"/> 380 Other Personal Property Damage<br><input type="checkbox"/> 385 Property Damage Product Liability | <input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881<br><input type="checkbox"/> 690 Other<br><b>LABOR</b><br><input type="checkbox"/> 710 Fair Labor Standards Act<br><input type="checkbox"/> 720 Labor/Management Relations<br><input type="checkbox"/> 740 Railway Labor Act<br><input type="checkbox"/> 751 Family and Medical Leave Act<br><input type="checkbox"/> 790 Other Labor Litigation<br><input type="checkbox"/> 791 Employee Retirement Income Security Act<br><b>IMMIGRATION</b><br><input type="checkbox"/> 462 Naturalization Application<br><input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158<br><input type="checkbox"/> 423 Withdrawal 28 USC 157<br><b>PROPERTY RIGHTS</b><br><input type="checkbox"/> 820 Copyrights<br><input type="checkbox"/> 830 Patent<br><input type="checkbox"/> 835 Patent - Abbreviated New Drug Application<br><input type="checkbox"/> 840 Trademark<br><b>SOCIAL SECURITY</b><br><input type="checkbox"/> 861 HIA (1395ff)<br><input type="checkbox"/> 862 Black Lung (923)<br><input type="checkbox"/> 863 DIWC/DIWW (405(g))<br><input type="checkbox"/> 864 SSID Title XVI<br><input type="checkbox"/> 865 RSI (405(g))<br><b>FEDERAL TAX SUITS</b><br><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)<br><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act<br><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))<br><input type="checkbox"/> 400 State Reapportionment<br><input type="checkbox"/> 410 Antitrust<br><input type="checkbox"/> 430 Banks and Banking<br><input type="checkbox"/> 450 Commerce<br><input type="checkbox"/> 460 Deportation<br><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations<br><input type="checkbox"/> 480 Consumer Credit<br><input type="checkbox"/> 485 Telephone Consumer Protection Act<br><input type="checkbox"/> 490 Cable/Sat TV<br><input type="checkbox"/> 850 Securities/Commodities/Exchange<br><input type="checkbox"/> 890 Other Statutory Actions<br><input type="checkbox"/> 891 Agricultural Acts<br><input type="checkbox"/> 893 Environmental Matters<br><input type="checkbox"/> 895 Freedom of Information Act<br><input type="checkbox"/> 896 Arbitration<br><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision<br><input type="checkbox"/> 950 Constitutionality of State Statutes |
| <b>REAL PROPERTY</b><br><input type="checkbox"/> 210 Land Condemnation<br><input type="checkbox"/> 220 Foreclosure<br><input type="checkbox"/> 230 Rent Lease & Ejectment<br><input type="checkbox"/> 240 Torts to Land<br><input type="checkbox"/> 245 Tort Product Liability<br><input type="checkbox"/> 290 All Other Real Property  | <b>CIVIL RIGHTS</b><br><input type="checkbox"/> 440 Other Civil Rights<br><input type="checkbox"/> 441 Voting<br><input type="checkbox"/> 442 Employment<br><input type="checkbox"/> 443 Housing/Accommodations<br><input type="checkbox"/> 445 Amer. w/Disabilities - Employment<br><input type="checkbox"/> 446 Amer. w/Disabilities - Other<br><input type="checkbox"/> 448 Education   | <b>PRISONER PETITIONS</b><br><b>Habeas Corpus:</b><br><input type="checkbox"/> 463 Alien Detainee<br><input type="checkbox"/> 510 Motions to Vacate Sentence<br><input type="checkbox"/> 530 General<br><input type="checkbox"/> 535 Death Penalty<br><b>Other:</b><br><input type="checkbox"/> 540 Mandamus & Other<br><input type="checkbox"/> 550 Civil Rights<br><input type="checkbox"/> 555 Prison Condition<br><input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement                                |  |   |   |

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from Another District (specify)  
☐ 6 Multidistrict Litigation - Transfer  
☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:  
Civil Forfeiture Action pursuant to 21 USC 881

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$**

CHECK YES only if demanded in complaint:

**JURY DEMAND:** ☐ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

DATE

02/25/2020

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

I. Civil Categories: (Please check one category only).

1. ☒ General Civil  
2. ☐ Administrative Review/Social Security  
3. ☐ Habeas Corpus Death Penalty

\*If under Title 28, §2255, name the SENTENCING JUDGE: \_\_\_\_\_

CASE NUMBER: \_\_\_\_\_

II. **RELATED OR REFILED CASES.** See LR 3.1 which provides in pertinent part: "If an action is filed or removed to this Court and assigned to a District Judge after which it is discontinued, dismissed or remanded to a State court, and subsequently refiled, it shall be assigned to the same Judge who received the initial case assignment without regard for the place of holding court in which the case was refiled. Counsel or a party without counsel shall be responsible for bringing such cases to the attention of the Court by responding to the questions included on the Civil Cover Sheet."

This action: ☐ is **RELATED** to another **PENDING** civil case ☐ is a **REFILED** case ☐ was **PREVIOUSLY REMANDED**

If applicable, please indicate on page 1 in section VIII, the name of the Judge and case number.

III. In accordance with Local Civil Rule 3.8, actions involving counties in the Eastern Division shall be filed at any of the divisional offices therein. Actions involving counties in the Western Division shall be filed at the Toledo office. For the purpose of determining the proper division, and for statistical reasons, the following information is requested.

ANSWER ONE PARAGRAPH ONLY. ANSWER PARAGRAPHS 1 THRU 3 IN ORDER. UPON FINDING WHICH PARAGRAPH APPLIES TO YOUR CASE, ANSWER IT AND STOP.

(1) **Resident defendant.** If the defendant resides in a county within this district, please set forth the name of such county

**COUNTY:** Summit

**Corporation** For the purpose of answering the above, a corporation is deemed to be a resident of that county in which it has its principal place of business in that district.

(2) **Non-Resident defendant.** If no defendant is a resident of a county in this district, please set forth the county wherein the cause of action arose or the event complained of occurred.

**COUNTY:**

(3) **Other Cases.** If no defendant is a resident of this district, or if the defendant is a corporation not having a principle place of business within the district, and the cause of action arose or the event complained of occurred outside this district, please set forth the county of the plaintiff's residence.

**COUNTY:**

IV. The Counties in the Northern District of Ohio are divided into divisions as shown below. After the county is determined in Section III, please check the appropriate division.

**EASTERN DIVISION**



AKRON

(Counties: Carroll, Holmes, Portage, Stark, Summit, Tuscarawas and Wayne)



CLEVELAND

(Counties: Ashland, Ashtabula, Crawford, Cuyahoga, Geauga, Lake,



YOUNGSTOWN

Lorain, Medina and Richland)

(Counties: Columbiana, Mahoning and Trumbull)

**WESTERN DIVISION**



TOLEDO

(Counties: Allen, Auglaize, Defiance, Erie, Fulton, Hancock, Hardin, Henry, Huron, Lucas, Marion, Mercer, Ottawa, Paulding, Putnam, Sandusky, Seneca VanWert, Williams, Wood and Wyandot)



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

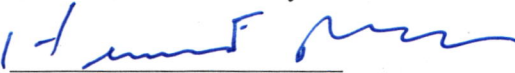
|                                      |   |                  |
|--------------------------------------|---|------------------|
| UNITED STATES OF AMERICA,            | ) | CIVIL ACTION NO. |
|                                      | ) |                  |
| Plaintiff,                           | ) | JUDGE            |
|                                      | ) |                  |
| v.                                   | ) |                  |
|                                      | ) |                  |
| \$350,050.00 IN U.S. CURRENCY SEIZED | ) |                  |
| ON OCTOBER 30, 2019,                 | ) |                  |
|                                      | ) |                  |
| \$6,000.00 IN U.S. CURRENCY SEIZED   | ) |                  |
| ON OCTOBER 30, 2019,                 | ) |                  |
|                                      | ) |                  |
| 18K YELLOW GOLD ROLEX DAY-DATE       | ) |                  |
| WATCH SEIZED ON OCTOBER 30, 2019,    | ) |                  |
|                                      | ) |                  |
| ASSORTED JEWELRY WITH AN             | ) |                  |
| APPROXIMATE VALUE OF \$67,361.00     | ) |                  |
| SEIZED ON OCTOBER 30, 2019,          | ) |                  |
|                                      | ) |                  |
| Defendants.                          | ) |                  |
|                                      | ) | <u>PRAECIPE</u>  |
|                                      | ) |                  |

Please issue a Warrant of Arrest in Rem on the Defendant \$350,050.00 in U.S. Currency, \$6,000.00 in U.S. Currency, 18K Yellow Gold Rolex Day-Date Watch, and Assorted Jewelry with Approximate Value of \$67,361.00 to the United States Marshals Service on behalf of the United States Attorney's Office.

Respectfully submitted,

Justin E. Herdman  
United States Attorney

By:

A handwritten signature in blue ink, appearing to read "H. DeBaggis", is written over a horizontal line.

Henry F. DeBaggis (OH: 0007561)  
Assistant United States Attorney  
801 West Superior Avenue  
Suite 400  
Cleveland, OH 44113-1852  
Tel. (216) 622-3749  
Fax. (216) 522-7499  
Henry.DeBaggis@usdoj.gov

# United States District Court

NORTHERN DISTRICT OF OHIO

WARRANT OF  
ARREST *IN REM*

TO: UNITED STATES MARSHALS SERVICE, AND/OR ANY OTHER DULY AUTHORIZED  
LAW ENFORCEMENT OFFICER:

WHEREAS, on 02/25/2020 a Complaint in Forfeiture  
was filed in this Court by Justin E. Herdman, United States Attorney for this District, on behalf of the United  
States, against:

\$350,050.00 U.S. Currency (CATS ID# 20-DEA-657473)  
\$6,000.00 U.S. Currency (CATS ID# 20-DEA-657472)  
18K Yellow Gold Rolex (CATS ID# 20-DEA-657670)  
Assorted Jewelry (CATS ID# 20-DEA-657671)

and WHEREAS, the defendant properties are currently in the possession, custody or control of the United  
States; and,

WHEREAS, Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset  
Forfeiture Actions directs the Clerk of the Court to issue a warrant of arrest *in rem* for the arrest of the defendant  
properties; and,

WHEREAS, Rule G(3)(c) of the Supplemental Rules for Admiralty or Maritime Claims and Asset  
Forfeiture Actions provides that the warrant of arrest *in rem* must be delivered to a person or organization  
authorized to execute it;

YOU ARE COMMANDED to arrest the defendant properties by serving a copy of this warrant on the  
custodian in whose possession, custody or control the properties are presently found, and to use whatever means  
may be appropriate to protect and maintain it in your custody until further order of this Court.

YOU ARE FURTHER COMMANDED to file the same in this Court with your return thereon.

WITNESS THE HONORABLE

UNITED STATES DISTRICT JUDGE AT

DATE

CLERK

(BY) DEPUTY CLERK

Returnable -60- days after issue.

United States Marshals Service

DISTRICT

DATE RECEIVED

DATE EXECUTED

PRINTED NAME

SIGNATURE



U.S. Department of Justice

## PROCESS RECEIPT AND RETURN

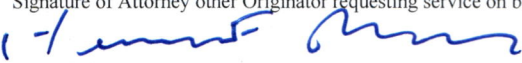
|  |   |   |   |
|--|---|---|---|
| PLAINTIFF<br>United States of America  |   | COURT CASE NUMBER                             |   |
| DEFENDANT<br>\$350,050.00 in U.S. Currency, et al.   |   | TYPE OF PROCESS<br>Warrant of Arrest in Rem   |   |
| <b>SERVE<br/>AT</b>  | NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN<br>\$350,050.00 in U.S. Currency, \$6,000.00 in U.S. Currency, 18K Yellow Gold Rolex, and Assorted Jewelry |   |   |
|  | ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)  |   |   |
| SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW   |   | Number of process to be served with this Form | 1 |
| Henry F. DeBaggis, Assistant United States Attorney<br>Office of the United States Attorney<br>801 W. Superior Avenue, Suite 400 United States Courthouse<br>Cleveland, Ohio 44113 |   | Number of parties to be served in this case   | 4 |
|  |   | Check for service on U.S.A.                   |   |

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (*Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service*):

Fold

Fold

\$350,050.00 in U.S. Currency (20-DEA-657473), \$6,000.00 in U.S. Currency (20-DEA-657472), 18K Yellow Gold Rolex Day-Date (20-DEA-657670), and Assorted Jewelry Valued at \$67,361.00 (20-DEA-657671).

|  |   |                                  |                    |
|--|---|----------------------------------|--------------------|
| Signature of Attorney other Originator requesting service on behalf of:<br> | <input checked="" type="checkbox"/> PLAINTIFF<br><input type="checkbox"/> DEFENDANT | TELEPHONE NUMBER<br>216-622-3749 | DATE<br>02/25/2020 |
|--|---|----------------------------------|--------------------|

SPACE BELOW FOR USE BY PROCESSING OFFICIAL ONLY - DO NOT WRITE BELOW THIS LINE

|  |                        |                                 |                                |  |               |
|--|------------------------|---------------------------------|--------------------------------|--|---------------|
| I acknowledge receipt for the total number of process indicated. | Total Process<br>_____ | District of Origin<br>No. _____ | District to Serve<br>No. _____ | Signature of Authorized Agent or Other Agency Personnel<br>_____ | Date<br>_____ |
|--|------------------------|---------------------------------|--------------------------------|--|---------------|

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above on the on the individual, company, corporation, etc. shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above (*See remarks below*)

|   |  |  |
|---|--|--|
| Name and title of individual served ( <i>if not shown above</i> ) | <input type="checkbox"/> A person of suitable age and discretion then residing in defendant's usual place of abode |  |
| Address ( <i>complete only different than shown above</i> )       | Date   | Time<br><input type="checkbox"/> am<br><input type="checkbox"/> pm |
|   | Signature<br>_____   |  |

|             |  |                |               |                  |                                 |
|-------------|--|----------------|---------------|------------------|---------------------------------|
| Service Fee | Total Mileage Charges including <i>endeavors</i> | Forwarding Fee | Total Charges | Advance Deposits | Amount owed (Amount of Refund*) |
|-------------|--|----------------|---------------|------------------|---------------------------------|

REMARKS:

PRIOR EDITIONS  
MAY BE USED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

|                                      |   |                  |
|--------------------------------------|---|------------------|
| UNITED STATES OF AMERICA,            | ) | CIVIL ACTION NO. |
|                                      | ) |                  |
| Plaintiff,                           | ) | JUDGE            |
|                                      | ) |                  |
| v.                                   | ) |                  |
|                                      | ) |                  |
| \$350,050.00 IN U.S. CURRENCY SEIZED | ) |                  |
| ON OCTOBER 30, 2019,                 | ) |                  |
|                                      | ) |                  |
| \$6,000.00 IN U.S. CURRENCY SEIZED   | ) |                  |
| ON OCTOBER 30, 2019,                 | ) |                  |
|                                      | ) |                  |
| 18K YELLOW GOLD ROLEX DAY-DATE       | ) |                  |
| WATCH SEIZED ON OCTOBER 30, 2019,    | ) |                  |
|                                      | ) |                  |
| ASSORTED JEWELRY WITH AN             | ) |                  |
| APPROXIMATE VALUE OF \$67,361.00     | ) |                  |
| SEIZED ON OCTOBER 30, 2019,          | ) |                  |
|                                      | ) |                  |
| Defendants.                          | ) |                  |
|                                      | ) | <u>NOTICE</u>    |

Party-in-Interest: Cory Grandison  
c/o Thomas Bauer, Jr. Esq.  
137 South Main Street 201  
Akron, Ohio 44308

The above-captioned forfeiture action was filed in U.S. District Court on February 25, 2020. A copy of the complaint is attached. If you claim an interest in the defendant property, the following applies.

Pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims, you are required to file with the Court, and serve upon Henry F. DeBaggis,

plaintiff's attorney, whose address is United States Attorney's Office; United States Court House; 801 West Superior Avenue, Suite 400; Cleveland, Ohio 44113, a verified claim to the defendant property within thirty-five (35) days after your receipt of the complaint. Said claim shall contain the information required by Rule G(5) of the said Supplemental Rules. Additionally, you must file and serve an answer to the complaint or a motion under Rule 12 of the Civil Rules of Procedure, within twenty (20) days after the filing of the claim, exclusive of the date of filing. If you fail to do so, judgment by default will be taken for the relief demanded in the complaint.

Respectfully submitted,

Justin E. Herdman  
United States Attorney

By:

A handwritten signature in blue ink, appearing to read "H. DeBaggis", is written over a horizontal line.

Henry F. DeBaggis (OH: 0007561)  
Assistant United States Attorney  
801 West Superior Avenue  
Suite 400  
Cleveland, OH 44113-1852  
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